

IN THE MATTER

of the Resource Management Act
1991

AND

IN THE MATTER

of Proposed Change 1 to the
Regional Policy Statement for
the Wellington Region – Hearing
Stream 5 (Freshwater / Te Mana
o te Wai)

STATEMENT OF PLANNING EVIDENCE OF LILY ANA CAMPBELL

3 NOVEMBER 2023

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INTRODUCTION

1. My name is Ms Lily Ana Campbell.
2. I have a Bachelor of Applied Science (major in Environmental Management and minor in Geographical Information Systems) with First Class Honours from the University of Otago. I am an associate member of the New Zealand Planning Institute.
3. I have been practicing as a planner since 2018, and I am currently employed as a Senior Planner at Kāhu Environmental Limited.
4. I have experience in regional and district plan reviews (including s42A preparation, s32 evaluation, and drafting provisions) and assisting in preparing submissions on policy statements, plans and resource consent applications. I have experience supporting mana whenua in the preparation of Iwi Environmental Management Plans and Fresh Water Plans, and assisting with requests for consultation with respect to consents, plan reviews and changes.
5. Of particular relevance, I have acted as the s42A reporting officer for submissions on the Proposed Waikato District Plan, Hearing 25: Zone Extents, Huntly. I have also been a s42A reporting officer for submissions on Variation 1: Marine Farming and Variation 1A: Finfish Farming to the Proposed Marlborough Environment Plan.

CODE OF CONDUCT

6. I confirm that I have read the Expert Witness Code of Conduct set out in the Environment Court's Practice Note dated 1 January 2023. I have complied with the Code of Conduct in preparing this evidence and agree to comply with it while giving oral evidence. Except where I state that I am relying on the evidence of another person, this written evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed in this evidence.

MATERIAL RELIED ON

7. In preparing my evidence I have read the following:
 - (a) The Regional Policy Statement for the Wellington Region (RPS).
 - (b) The material comprising Proposed Plan Change 1 to the RPS (PC1).
 - (c) The PC1 s32 Report where it relates to matters addressed in Hearing Stream 5.

- (d) The s42A report titled 'Proposed Change 1 to the Regional Policy Statement for the Wellington Region: Section 42A Hearing Report, Hearing Stream 5' dated 20 October 2023 (including appendices).
- (e) The evidence of Ami Coughlan (Wellington Fish and Game Council).

SCOPE OF EVIDENCE

- 8. The Wellington Fish and Game Council ('Fish and Game') have engaged me to provide expert planning evidence on the matters raised in its submission on the Wellington Regional Policy Statement – Plan Change 1 ('PC1') regarding the provisions being addressed in Hearing Stream 5.
- 9. I have not individually addressed each of the submission points. Unless specifically addressed in my evidence, I generally agree with and support the recommendations in the s42A report.
- 10. A summary of all the Fish and Game submission points relevant to Hearing Stream 5 and the position relating to the s42A authors recommendations, and my recommendations are set out in Appendix A to my evidence.
- 11. The next part of my evidence addresses the following provisions where my opinion is different to that in the s42A report:
 - (a) Objective 12.
 - (b) Policy 12.
 - (c) Policy 40 (and consequentially, Policy 18).
 - (d) Objective 13 Freshwater Anticipated Environmental Results 1 and 4.

OBJECTIVE 12

- 12. The purpose of Objective 12 is to describe how the management of freshwater in the region will give effect to Te Mana o te Wai¹. A number of submissions were made on this objective, including from Fish and Game, which sought more recognition of community values.
- 13. In general, I support the deletion and replacement of the text in Objective 12 recommended in the s42A report, as it provides a more succinct expression of how the

¹ Part 3: Implementation, Subpart 1 Approaches to implementing the National Policy Statement, 3.2 Te Mana o te Wai (3).

management of freshwater in the region will give effect to Te Mana o te Wai. However, there are some values that I consider should be recognised in the objective, which I will expand on below.

Community and recreational values

14. When determining how Te Mana o te Wai applies in the region, councils must engage with tangata whenua and communities². This means that the objective must be informed by, and reflect, the input of all people in the region, as well as tangata whenua. Objective 12 must also give effect to the objectives and policies of the National Policy Statement for Freshwater Management ('NPS-FM').
15. Community is central to Te Mana o te Wai, the concept of which is described as restoring and preserving the balance between people, the water and the wider environment.³ The principles of 'stewardship' and 'care and respect'⁴, illustrate the importance of Te Mana o te Wai to all New Zealanders, and how it should encompass the aspirations and values of all people in Aotearoa. Recreational activities play an important role in Te Mana o te Wai, as they contribute to the ability of people and communities to provide for their social, economic, and cultural well-being.
16. As currently recommended by the s42A author, Objective 12 reflects tangata whenua values, which is appropriate. However in my opinion, it does not provide adequate recognition of the wider community values consistent with Te Mana o te Wai. In my view, there needs to be greater acknowledgement of the community and recreational values that reflect Te Mana o te Wai in the Wellington Region.
17. Recreational activities such as fishing and swimming are highly valued in the Wellington Region and are recognised in a number of policy documents⁵. People should be able to carry out these activities safely, so they can receive the benefits to their wellbeing that recreation provides. Under the NPS-FM hierarchy of obligations, human health is given second priority (after the environment). Human contact, which supports swimming and other water-based activities, is a compulsory value to be recognised throughout the Wellington Region. This signifies the importance of recreation in the NPS-FM.
18. While not directly relevant to these proceedings, I note that the Natural and Built Environment Act ('NBEA') recognises recreational use and enjoyment of the environment as an outcome that must be met to ensure that the purpose of the NBEA

² Part 3: Implementation, Subpart 1 Approaches to implementing the National Policy Statement, 3.2 Te Mana o te Wai (1).

³ 1.3 Fundamental concept – Te Mana o te Wai, Concept (1).

⁴ 1.3 Fundamental concept – Te Mana o te Wai Framework. Principles (e) and (f).

⁵ Including the RPS, Long Term Plan, and in recently developed whaitua implementation programmes.

is achieved⁶. This emphasises that, at the national level, the maintenance and enhancement of recreational values is considered important.

19. I acknowledge the incredibly important relationship that tangata whenua have with the wai and surrounding taiao. Regional councils have an obligation to actively involve tangata whenua in freshwater management⁷, which I strongly support. The inclusion of community values should not detract from this relationship, but simply contribute to the diversity of values and knowledge that inform the management of freshwater in the region.
20. In order to provide recognition of the important community values and how this is reflected in Te Mana o te Wai, I recommend the inclusion of a new clause in Objective 12, to read as follows (or to similar effect):

x) Supports the wellbeing and safety of the community, by providing for the ability of people to carry out recreational activities, in and around fresh water environments.

Protecting the habitat of trout

21. Policy 10 of the NPS-FM directs protection of the habitat of trout and salmon, as long as this is consistent with the protection of indigenous freshwater habitat⁸. The NPS-FM recognises fishing as a value that councils must consider when determining the values that apply to an FMU.⁹
22. Not only do recreational activities support the wellbeing of people, by providing for values such as fishing, an abundance of other values can also receive benefits.
23. In that respect, it is my understanding from the evidence of Ami Coughlan that:
 - (a) abundant and diverse habitat is essential to protect the habitat of trout; and
 - (b) when rivers and streams are healthy, they can support both indigenous species and trout.
24. This healthy habitat supports a range of other values, such as ecosystem health, and mahinga kai (compulsory values under the NPS-FM).

⁶ NBEA s6(7)
⁷ 3.4 Tangata whenua involvement (1).
⁸ Policy 9 of the NPS-FM.
⁹ Appendix 1B of the NPS-FM.

25. While trout can have a negative impact on the habitat of some indigenous fish, this is not universal, and trout and indigenous species co-exist in many habitats. I also understand from Ami Coughlan's evidence that, where interactions are negative, this can be identified and managed at a site specific level. In this way, the goals of Policy 9 and Policy 10 can both be achieved, and are consistent with one another.
26. With this in mind, I consider that making provision for an abundance and diversity of freshwater habitats for both trout and indigenous species in Objective 12 will make an important and positive contribution towards describing how freshwater management in the region will give effect to Te Mana o te Wai.
27. For these reasons, I recommend a new clause be added to Objective 12, to read as follows (or to similar effect):

y) Provides for an abundance and diversity of freshwater habitats that supports a healthy population of trout, where that is consistent with protecting the habitat of indigenous species.

Natural form and character

28. The recognition of natural character as a matter of national importance under the RMA¹⁰, solidifies its importance at the national level. The Act provides a strong imperative to 'preserve' natural character and 'protect' it from inappropriate subdivision, use and development. This flows through into the NPS-FM, where under the NOF, natural form and character is a value that must be considered by regional councils when identifying values that apply to an FMU¹¹.
29. In my view, natural form and character is a crucial element of Te Mana o te Wai, the reasons for which, I will address below.
30. Natural form and character is a crucial element of Te Mana o te Wai. The physical form of a water body is recognised as part of the 'habitat' a component of ecosystem health¹² (a compulsory value under the NPS-FM). Protecting the mauri of a waterbody (as directed by the fundamental concept – Te mana o te Wai¹³), will often go beyond ecosystem health, and require that the waterbody has the ability to express its natural form and character by moving within its bed, or changing course or connecting with

¹⁰ Part 2, Section 6 (a) of the RMA 1991

¹¹ Listed under Appendix 1B of the NPS-FM

¹² Appendix 1A – Compulsory values

¹³ NPS-FM. 1.3 Fundamental concept – Te Mana o te Wai. Concept (1)

riparian areas¹⁴. When prioritising the health of freshwater¹⁵, the mauri of the wai must be protected. Rivers and streams must be able to demonstrate their natural form and character, carry out their natural processes, and follow their natural patterns, in order to uphold and protect their mauri, give effect to Te Mana o te Wai, prioritise their health and wellbeing, provide for ecosystem health, and preserve natural character.

31. Giving effect to Te Mana o te Wai, means managing freshwater in a way that preserves and protects the natural character and form of waterbodies. It is my understanding¹⁶, that this has many consequential benefits for other values. Preserving natural form of rivers provides diverse habitat, which in turn supports the various life stages of both trout and for indigenous freshwater species. Providing for natural character and form in rivers and streams can also have flow-on positive effects for amenity and recreational values important to the community.
32. Given the above, I recommend the inclusion of a new clause in Objective 12 to reflect the importance of natural character and form in Te Mana o te Wai, to read as follows (or to similar effect):

z) Preserves the natural character and form of waterbodies.

POLICY 12

33. In its submission, Fish and Game expressed its strong support for the concept of Te Mana o te Wai, and its aspiration for 'true partnership between legislative bodies, statutory managers, tangata whenua / mana whenua, stakeholders and the community'¹⁷.
34. Fish and Game indicated its strong support for the proposed changes to Policy 12, in order to give effect to the NPS-FM.
35. The purpose of Policy 12 is to direct how regional plans shall give effect to Te Mana o te Wai in the management of freshwater in the region. As discussed earlier in my evidence, Te Mana o te Wai should reflect the values and aspirations of communities that are identified through engagement, which is required by the NPS-FM¹⁸.

¹⁴ Guidance on the National Objectives Framework of the NPS-FM, Clause 1.3: The fundamental concept of Te Mana o te Wai and its use in the NOF. July 2022.

¹⁵ As required by hierarchy of obligations under 1.3 Fundamental concept – Te Mana o te Wai. Concept (5)
¹⁶ From discussions with Ami Coughlan, author of 'Risk assessment and mitigations of the potential impacts of trout predation on New Zealand's indigenous fish species'. A thesis presented in partial fulfilment of the requirements for the degree of Master of Science in Ecology at Massey University, Manawātū, New Zealand. 2022.

¹⁷ P. 39 of the submission on the Wellington RPS Proposed PC1 by the Wellington Fish and Game Council

¹⁸ Part 3: Implementation, Subpart 1 Approaches to implementing the National Policy Statement, 3.2 Te Mana o te Wai (1).

36. On this basis, I consider that in order to give proper effect to Te Mana o te Wai in the Wellington Region (and the NPS-FM), Policy 12 should acknowledge the contribution of the wider community towards regional plan-making.
37. Fish and Game sought relief to give greater recognition to stakeholders and the community in the relation to Method FW.1. The s42A author accepted the relief sought by Fish and Game in part, and recommended introducing the following wording in relation to the preparation of Freshwater Action Plans:

'...and through engagement with communities, stakeholders and territorial authorities...'

38. As discussed earlier in my evidence, regional councils have an obligation to actively involve tangata whenua in freshwater management, and this is reflected in a unique partnership, which I strongly support. The recognition of community and stakeholder input should not detract from this relationship, but acknowledge the role that community values play in determining the local expression of Te Mana o te Wai. The wider community (including stakeholders and landowners) contribute to the diversity of values and knowledge that inform the management of freshwater, which is supported by clause 3.2 (2)(d) of the NPS-FM¹⁹.
39. I consider that the wording recommended by the s42A author in relation to Method FW.1, should be included in Policy 12. In my view, this would improve the policy by giving proper effect to Te Mana o te Wai, and the NPS-FM.
40. For these reasons, I recommend that Policy 12 is amended to read as follows:

Policy 12: Management of water bodies – regional plans

Regional plans shall give effect to Te Mana o te Wai and include objectives, policies, rules and/or methods that:

...

(a) are prepared in partnership with mana whenua / tangata whenua and through engagement with communities, stakeholders and territorial authorities, and enable the application of mātauranga Māori ;

(aa) adopt an integrated approach, ki uta ki tai

...

POLICY 40

¹⁹ Clause 3.2 (2)(d) reads as follows: 'enable the application of a diversity of systems of values and knowledge, such as mātauranga Māori, to the management of freshwater'

Use of 'to the extent practicable'

41. In its submission, Fish and Game sought the inclusion of three new clauses to Policy 40. These were in relation to the loss of river extent and values, loss of extent of natural inland wetlands, and protecting the habitat of indigenous freshwater species and trout and salmon.
42. The s42A author recommended these clauses be added to the policy, with some changes. Clause (o) was recommended, to read as follows:

(o) avoiding the loss of river extent or values, to the extent practicable

43. The term 'practicable' is well used in resource management planning, and is commonly understood to include consideration of the costs involved and matters of practical convenience. By including the qualifier 'to the extent practicable', the meaning of the policy changes significantly from 'absolute' avoidance to, avoidance subject to the 'practicability' of doing so. While it could be argued that the RPS does not need to provide as much detail as the regional plan and can contain broader policy, I do not consider this to be appropriate here, where the language used could mislead plan users with respect to the policy intent and desired outcomes.
44. I acknowledge that this recommended wording is used in Policy 7 of the NPS-FM, and the intention is to ensure consistency with national direction. However, in my opinion, the provisions in Subpart 3.24 of the NPSFM clarify what is meant by 'practicable' in this context and provide important constraints around its interpretation. I consider this to be clear direction for the effects management hierarchy and a functional need test to be applied.
45. The directions of Subpart 3.24 relating to functional need and effects management hierarchy, are at the regional plan level. The Natural Resources Plan ('NRP') contains a policy that implements this, which is Policy P110²⁰. The NRP has to give effect to the RPS, and will be reviewed in the near future. It is important that the RPS is clear and its interpretation is well understood, so that the regional plan can give effect to it efficiently.
46. The wording 'to the extent practicable' with no qualifiers, when combined with enabling policy for activities elsewhere in the RPS, could be argued to 'open the door' to a wider

interpretation of 'practicable' than what was intended and is allowed by the clause 3.24 of the NPS-FM. This would lead to an inefficient plan process.

47. In my opinion, the RPS should be clear and transparent about the constraints on the practicability analysis, to avoid confusion, and to ensure a more efficient planning process.
48. I recommend that clause (o) is amended to refer to an activity's functional need, and the application of the effects management hierarchy. This prevents the statement from being interpreted as more lenient than intended, by ensuring all steps of the effects management hierarchy are applied, rather than relying on a single 'practicability' test. It also clarifies that the loss of river extent and values must be avoided, unless the activity has a functional need to be there.
49. Wording similar to that in NPS-FM clause 3.24 has been used in other amendments recommended by the s42A author²¹, and therefore this requested change will ensure consistency with the language used elsewhere in the RPS, and will improve plan readability.
50. I recommend Policy 40(o) be amended to read as follows:

(o) avoiding the loss of river extent or values, ~~to the extent~~ practicable unless:

(i) there is a functional need for the activity in that location; and

(ii) the effects of the activity are managed by applying the effects management hierarchy.

Need for consequential amendment to Policy 18

51. While the Fish and Game submission did not make explicit requests in relation to avoiding the loss of river extent and values, I consider it important to bring to attention this matter in relation to Policy 18, based on its merit.
52. The s42A author recommended that clause (e) of Policy 18 be amended to read as follows:

²¹

See recommended amendments to Policy 14, and clause (n) of Policy 18 of the RPS

avoiding the loss of river extent and values to the extent practicable

53. In the recommendation report²², the s42A author states:

'As notified, clause (e) does not include the qualifier 'to the extent practicable'. I agree with Hort NZ that this should be included so that the RPS does not impose direction that is more stringent than the NPS-FM in this regard.'

54. It is important to note, that a regional policy statement can include more stringent measures than required by NPS-FM, with nothing limiting the general obligations under the RMA²³.
55. Regional councils must give effect to Te Mana o te Wai, which is articulated through engagement with tangata whenua, stakeholders and the community on their values and aspirations for freshwater²⁴. When doing this, regional councils must apply the hierarchy of obligations, which prioritises the health and wellbeing of water. If tangata whenua and the community seek unconditional avoidance of river extent and values loss, then more stringent policy direction to achieve may be appropriate.
56. The circumstances in the Wellington Region, may mean that a more stringent policy direction is appropriate. Nonetheless, if the Panel consider it most appropriate that the loss of river extent and values is avoided in a way that is not absolute, then at the minimum, it must be qualified in a way that is no less stringent than the NPS-FM.
57. As discussed earlier in my evidence, I consider the use of the language 'to the extent practicable' could be problematic. I suggest the clause is amended to reflect the wording used in clause 3.24 of the NPSFM, which clarifies that practicability is subject to the application of the functional need test and effects management hierarchy. This is consistent with similar amendments to the RPS made by the s42A report author.
58. I suggest that clause (e) be amended to read as follows:

(e) avoiding the loss of river extent and values ~~to the extent practicable~~ unless:

(i) there is a functional need for the activity in that location;
and

²² Para 660 of the s42A report

²³ NPS-FM 2020, Part 3: Implementation. 3.1 Overview of Part

²⁴ NPS-FM 2020, Part 3: Subpart 1 Approaches to implementing the National Policy Statement 3.2 Te Mana o te Wai

(ii) the effects of the activity are managed by applying the effects management hierarchy.

OBJECTIVE 13

Freshwater AER 1

59. In its submission, Fish and Game requested the amendment of Objective 13 Freshwater AER 1 to refer to sensitive macroinvertebrate taxa abundance.

60. The s42A author accepted this relief sought in part, expressing that²⁵:

"...‘maintained’ should be retained, so that the AER is at least maintained, and where possible improving..."

61. The amendments recommended by the s42A author read as follows:

1. Macro-invertebrate diversity and sensitive macroinvertebrate taxa abundance in rivers and lakes is ~~maintained~~ improving across the Region.

62. The recommended wording does not align with the s42A author’s analysis. It is not clear if the recommendation is seeking to maintain macro-invertebrate diversity and sensitive macroinvertebrate taxa abundance, or to improve it.

63. I consider the use of both ‘maintained’ and ‘improved’ is inappropriate, because if the anticipated outcome is improvement, this assumes the state will be enhanced in value or quality²⁶. The use of the word maintained portrays a contrary outcome. While the NPS-FM provides strong direction to prioritise the health of the wai, of which ecosystem health is an important component, there may be circumstances where the macro-invertebrate diversity and abundance is already high. In these situations, maintenance would be more appropriate.

64. Policy 5 of the NPS-FM requires that freshwater is managed so that the health and well-being of degraded water bodies and freshwater ecosystems is improved, and the health and well-being of all other water bodies and freshwater ecosystems is maintained. On this basis, I consider that the Freshwater AER should be amended to reflect wording similar to Policy 5.

²⁵ Para 935 of the s42A report

²⁶ Merriam-Webster Dictionary. Definition of ‘improve’: to enhance in value or quality: make better

65. However, if communities choose 'improvement' as the desired outcome, this should be reflected in the anticipated environmental result, as directed by Policy 5 of the NPS-FM.
66. I recommend AER 1 be amended to read as follows (or to similar effect):

1. Macro-invertebrate diversity and sensitive macroinvertebrate taxa abundance in rivers and lakes is ~~improving~~ improved where degraded, and maintained otherwise, across the Region.

Freshwater AER 4

67. In its submission, Fish and Game sought amendments to AER 4 in order to better give effect to the NPS-FM, in particular, Policy 10.
68. I support the recommendation by the s42A author to adopt the relief sought by Fish and Game in part, but suggest minor amendments to ensure that the AER is consistent with higher order policy. The NPS-FM directs protection of the *habitat* of indigenous species and trout and salmon²⁷, not *populations* of freshwater fish.
69. I therefore recommend that Freshwater AER 4 is amended better align with the NPS-FM, and to read as follows (or words to similar effect):

The protection of existing ~~Existing~~ fish habitat supports healthy fish populations, and the diversity of valued fish fauna is maintained or increased across the region.

CONCLUSION

70. My evidence has addressed the submission from the Wellington Fish and Game Council on provisions relating to Hearing Stream 5 for Plan Change 1.
71. A summary of the Fish and Game submission points under Hearing Stream 5 and the position relating to the s42A authors recommendations, is found in Appendix A.
72. Where I have recommended amendments to provisions in this evidence, these are found in Appendix B.

²⁷ Policies 9 and 10 of the NPS-FM

Dated 3 November 2023

A handwritten signature in dark ink, appearing to read 'L Campbell', with a large, sweeping underline that loops around the bottom of the signature.

Lily Ana Campbell

APPENDIX A: SUMMARY OF DECISIONS REQUESTED RELATING TO HEARING 5

Submission points	Provision	Relief sought by F&G in submission	42A Reject/ Accept	F&G position
S147.007	Objective 12	Replace Objective 12	Accept in part	Amendment requested
S147.008	Policy 12: Management of water bodies - regional plans	Seek clarification of paragraph	Accept in part	Support
S147.009	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	New subclause (fa)	Accept in part	Amendment requested
S147.010		New subclause (ha)	Accept in part	Support
S147.011		New subclause (ma)	Accept in part	Support
S147.012	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	New subclause (ea)	Reject	Support
S147.013		Amend clause (g)	Accept in part	Support
S147.055			Accept in part	Support
S147.015	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	New subclause	Accept in part	Support
S147.052	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Retain as notified	Accept in part	Support
S147.053	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Retain as notified	Reject	Support
S147.054	Policy 17: Take and use of water for the health needs of people - regional plans	Retain as notified	Accept in part	Support
S147.056	Policy FW.1: Reducing water demand - regional plans	Retain as notified.	Accept in part	Support
S147.057	Policy FW.2: Reducing water demand - district plans	Retain as notified.	Accept in part	Support
S147.058		Retain as notified.	Accept in part	Support

Submission points	Provision	Relief sought by F&G in submission	42A Reject/ Accept	F&G position
S147.016	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Amend clause (k)	Reject	Support
S147.017		New clause (ka)	Reject	Support
S147.059	Policy FW.4: Financial contributions for urban development - district plans	Retain as notified.	Reject	Support
S147.067	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Retain as notified.	Accept in part	Support
S147.068	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Retain as notified.	Accept in part	Support
S147.069	Policy FW.5: Water supply planning for climate change and urban development - consideration	Retain as notified.	Accept in part	Support
S147.075	Policy FW.6: Allocation of responsibilities for land use and development controls for freshwater	Retain as notified.	Accept in part	Support
S147.080	Policy FW.7: Water attenuation and retention – non-regulatory	Retain as notified.	Accept in part	Support
S147.088	Method FW.1: Freshwater Action Plans	Amend	Accept in part	Support
S147.093	Method FW.2: Joint processing urban development consents	Retain as notified.	Accept in part	Support
S147.094	Method 30: Implement the harbour and catchment management strategy for Porirua Harbour	Retain as notified.	Accept in part	Support
S147.095	Method 34: Prepare a regional water supply strategy	Retain as notified.	Accept in part	Support
S147.0102	Method 48: Water allocation policy review	Retain as notified.	Accept in part	Support
S147.0105	Objective 13 Freshwater Anticipated environmental results	Amend AER 1	Accept	Amendment requested
S147.0106		Amend AER 4	Accept	Amendment requested
S147.0107		Amend AER 5	Reject	Support
S147.0108		Retain as notified.	Accept in part	Support

APPENDIX B: PROPOSED WORDING AMENDMENTS

Provision	Amendments recommended in this evidence
Objective 12	<p>Insert the following three clauses into Objective 12:</p> <p><u>x) Supports the wellbeing and safety of the community, by providing for the ability of people to carry out recreational activities, in and around fresh water environments.</u></p> <p><u>y) Provides for an abundance and diversity of freshwater habitats that supports a healthy population of trout, where that is consistent with protecting the habitat of indigenous species.</u></p> <p><u>z) Preserves the natural character and form of waterbodies.</u></p>
Policy 12	<p><i>Regional plans shall give effect to Te Mana o te Wai and include objectives, policies, rules and/or methods that:</i></p> <p>...</p> <p><i>(a) are prepared in partnership with mana whenua / tangata whenua <u>and through engagement with communities, stakeholders and territorial authorities</u>, and enable the application of mātauranga Māori ;</i></p> <p><i>(aa) adopt an integrated approach, ki uta ki tai</i></p> <p>...</p>
Policy 40	<p>Amend clause (o) of Policy 40 to read as follows:</p> <p><u>(o) avoiding the loss of river extent or values, to the extent practicable unless:</u></p> <p><u>(i) there is a functional need for the activity in that location; and</u></p> <p><u>(ii) the effects of the activity are managed by applying the effects management hierarchy.</u></p>
Objective 13 Freshwater AER 1	<p>Amend AER 1 to read as follows:</p>

	1. Macro-invertebrate diversity and sensitive macroinvertebrate taxa abundance in rivers and lakes is improving <u>improved where degraded, and maintained otherwise,</u> across the Region.
Objective 13 Freshwater AER 4	Amend AER 4 to read as follows: 4. <u>The protection of existing</u> Existing fish habitat <u>supports healthy</u> fish populations, and the diversity of valued fish fauna is maintained or increased across the region.
Provision	Consequential amendments recommended in this evidence
Policy 18	Amend clause (e) of Policy 18 to read as follows: (e) avoiding the loss of river extent and values to the extent practicable <u>unless:</u> (i) <u>there is a functional need for the activity in that location; and</u> (ii) <u>the effects of the activity are managed by applying the effects management hierarchy.</u>